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ALSO ADMITTED IN
THE DISTRICT OF COLUMBIA

ALSO ADMITTED IN
MASSACHUSETTS

May 18, 1995

BY HAND DELIVERY

The Honorable Alan Jaroslovsky
99 South "E" Street
Santa Rosa, California 95404-6524

Re: In re Gerald Armstrong, Case No. 95-10911 aj

Dear Judge Jaroslovsky,

Included herewith you will find an emergency motion to seal certain exhibits, together with a declaration in support thereof and a proposed order.

This motion relates to the seven volumes of material recently filed by the debtor in the above-captioned matter, apparently in opposition to our motion for relief from stay, currently set for hearing on May 25. It is our position that all seven volumes are wholly irrelevant and we therefore seek an order shortening time so that our motion to strike may be heard on May 25.

More importantly, however, 2 volumes contain highly confidential materials which have been held to constitute trade secrets, Bridge Publications Inc. v. Vien (S.D.Cal. 1993) 827 F.Supp. 629 at 633, citing Religious Technology Center v. Scott (9th Cir. 1989) 869 F.2d 1306, 1309-10. Therefore, we are also requesting that these volumes be sealed immediately pending the hearing on our motion to strike which is in preparation. It may interest you to know, as further described in the accompanying papers, that Armstrong filed these exact same materials in Marin County Action No. 157680, the subject of our motion for relief from stay. The Hon Gary Thomas sealed these materials pending a motion to strike, and later struck them.

The parties will all be available for a conference call at 11:00 a.m., should you decide that argument would be helpful.

Sincerely,

Laurie J. Bartilson
Laurie J. Bartilson

enc.

cc: Gerald Armstrong (BY TELEFAX)

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FAX COVERSHEETDATE: May 18, '95 TIME: _____TO: Gerald Armstrong FAX NO: _____FROM: Laurie Bartilson

COMMENTS: _____

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